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13	cindy@cadiamond.com		
14	Attorneys for Defendant		
15	ROWLAND MARCUS ANDRADE		
16	IN THE UNITED C	TATES DISTRICT COLUDT	
17	IN THE UNITED STATES DISTRICT COURT		
18	IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA		
19	SAN FRAN	NCISCO DIVISION	
20	THE UNITED STATES OF AMERICA,) Case No.: 20-CR-00249-RS	
21	Plaintiff,)	
22	Piainuii,) DECLARATION OF CINDY A.) DIAMOND IN SUPPORT OF	
	Vs.	DEFENDANT'S AMENDED MOTION TO	
23	ROWLAND MARCUS ANDRADE,	EXCLUDE FINANCIAL RECORDS	
24	Defendant.	THROUGH 2019 OR TO CONTINUE FOI	
25	Defendant.	FURTHER REVIEW BASED ON BRADY V. MARYLAND VIOLATION	
) / . MARTEAU VIOLATION	
26			
27	I, Cindy A. Diamond, hereby state and declare:		
28	1. I am an attorney, duly licensed to	practice law in the State of California and before	
	- -		
		DECLARATION OF CINDY A. DIAMOND IN SUPPORT OF DEFENDANT'S AMENDED MOTION TO EXCLUDE FINANCIAL RECORDS OR TO CONTINUE FOR FURTHER REVIEW BASED ON BRADY V	
	MARYLAND VIOLATION		
	UNITED STATES v. ANDRADE, Case # 20-CR-00249-RS - Page 1		

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this Court. I am associate counsel representing defendant Rowland Marcus Andrade, and the facts asserted herein are based on my knowledge obtained during my representation of Mr. Andrade in this case.

- 2. On January 30, 2025, at 8:10 p.m., Mr. Andrade's attorneys received an email from Mr. Chou, representing the government, disclosing to us an itemized list of files that were within the government's discovery production from January 17, 2025. This discovery production was the production which prompted defendant's motion to preclude the government from using AtenCoin related financial documents or other financial records through 2017, or to continue the trial so we can make use of these documents to assist the defense case. See ECF-511. A true copy of the government's itemized list, in pdf format (requiring enlargement on a computer screen to read easily), is attached to this declaration as Exhibit A. As shown, the list includes filenames relevant to Mr. Andrade's financial transactions through 2019, not only through 2017 as we had believed when the defense filed ECF-511.
- 3. I have discussed this list with Karl Ruzicka, C.P.A., the certified accountant who was on retainer for Mr. Andrade's businesses from 2014 through 2019. Preliminarily, Mr. Ruzicka was able to recognize the files as his own work, but we conferred when he was not able to view the entire list on a large computer screen. He indicated to me filenames are consistent with those used by Mr. Ruzicka's for his work as Mr. Andrade's business accountant from the years beginning in 2014 through the middle of 2019.
- 4. Copies of Mr. Ruzicka's material were not contained in the government's productions to present defense counsel, which the defense counsel learned when Mr. Chou told the court, at the pretrial conference on January 21, 2025, that the documents produced to the defendant on January 17, 2025 were material that had not been previously disclosed. I reviewed an IRS-CI memorandum of interview ("MOI") of Ruzicka's interview by IRS Criminal Investigation unit agent Bryan Wong, originally prepared on or about February 20, 2020 (but produced later), a copy of which is attached hereto as Exhibit B and incorporated by reference. This MOI did not mention the fact that the IRS agents seized with Mr. Ruzicka's folders containing paper invoices he had received, and Ruzicka's physical carbon-backed copy checkbook he used for Mr.

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Andrade's account, nor that Ruzicka agreed to send the IRS agents copies all his electronic files relating to Mr. Andrade's business accounting within a week, in compliance with a subpoena served to him on February 20, 2020, which I believe occurred based on what Mr. Ruzicka told me when we discussed this index on January 31, 2025.

5. The documents from Ruzicka are relevant material that will be helpful to the defense, but only after we have our forensic accountant review it, analyze it, and incorporate it into the overall financial analysis she is developing to summarize and categorize Mr. Andrade's full financial picture for the jury. Mr. Ruzicka included in his files his own notes, invoices, communications, receipts, bank records, and spreadsheets, covering the years from 2014 through 2018, as well as data received for his review from Mr. Andrade's third-party bookkeeping source, Office Squad.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief. Executed this 2nd day of February, 2025, in San Francisco, California.

 $/_{S}/$

CINDY A. DIAMOND Declarant

Case 3:20-cr-00249-RS Document 523-1 Filed 02/02/25 Page 4 of 21

EXHIBIT A

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                                                                                                                ATEN GROUP LTD SHARE PURCHASE AGREEMENT-DR, MICHAEL WITTE-2.pdf
                                                                                                                Kent Myers-Share Purchase Agreement 1.pdf
Rolland Myers Share Agreement Executed.pdf
Tyler Hoff-Share Purchase Agreement Fully-Executed.pdf
IRS-DOCS-00035004 IRS-DOCS-00035012
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Update AtenGroup Credits
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 | IRS-DOCS-00035154 | IRS-DOCS-00035161 | August 2016 Invoices.pdf | IRS-DOCS-00035162 | IRS-DOCS-00035169 | August 2016 Invoices.pdf | IRS-DOCS-00035170 | IRS-DOCS-00035170 | Updated Excel Sheet for August, and Wood Forest Statements
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0910, June 2016.pdf
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IRS-DOCS-00035193 IRS-DOCS-00035196 5589, June 2016.pdf
IRS-DOCS-00035197 IRS-DOCS-00035200 5589, March. 2016.pdf
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Aug 2016 to Jan 2017, missing WellsFargo
Aug 2016 to Jan 2017 (missing WellsFargo).xlsx
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04a Wells Fargo Checking-Mike Medrow.pdf
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Nov 2016 to Jan 2017 & WOODFOREST bnk acct, PBC 080417 (missing WellsFargo).xlsx
Sept to Oct 2016. PBC 072517 .xlsx
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RE: Check for Karl Ruzicka
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Re: Approval David Salmon Invoices
RE: The Change Group CHECK
RE: Check to Legal Work, WhitakerChalk
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 IRS-DOCS-00035423 IRS-DOCS-00035425 2018.04.13 Letter to David Bradley enclosing $25,000 cashiers check from Fintech for TRO.PDF IRS-DOCS-00035426 IRS-DOCS-00035426 email invoice wordage .docx IRS-DOCS-00035427 IRS-DOCS-00035427
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IRS-DOCS-00035579
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                                                                                                    FW: Retainer Invoice
89164842_1_UKMATTERS(080518 Invoice for monies on account (Signed)).pdf
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Payment
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                                                                                                     Fwd: Amtrak: eTicket and Receipt for Your 06/05/2018 Trip - GEORGE GETZ
 IRS-DOCS-00035740 IRS-DOCS-00035740 Approved Expenses IRS-DOCS-00035741 IRS-DOCS-00035741 JDL Expense Report 7 11 18.xlsx IRS-DOCS-00035742 IRS-DOCS-00035742 Langdon J $10K wire (1of2).pdf
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Fwd: Amtrak: eTicket and Receipt for Your 06/04/2018 Trip - GEORGE GETZ
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Combined Bills 344462176 1534369830.pdf
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 IRS-DOCS-00035786 IRS-DOCS-00035788
  IRS-DOCS-00035789 IRS-DOCS-00035790
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 IRS-DOCS-00035791
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20180831 10048.PDF
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Whitaker Chalk / Black Gold invoices dated 8/31/18
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| IRS-DOCS-00035981 | IRS-DOCS-00035985 | the_change_group__nac_support_sow_20180928.pdf |
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Whitaker Chalk invoices dated 9/30/18
2018-11-02_FP Complete_AML Bitcoin_Deposit Invoice.pdf
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IRS-DOCS-00036026 IRS-DOCS-00036028
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Black Gold invoices.pdf
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Chetu Inc, Inv WO pdf
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NAC_Foundations_LLC_WO.pdf
Fwd: URGENT - PLEASE READ - Ralph Horne v Checkpal
Global Vision Sys past invoices paid 12-10-18.xlsx
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IRS-DOCS-00036158
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IRS-DOCS-00036181 IRS-DOCS-00036181 Invoice #35881 (National Aten Coin).pdf
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Invoice #35256 (National Aten Coin).pdf
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20181130 10190.PDF
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Whitaker Chalk invoices dated 11/30/18
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IRS-DOCS-00036388 IRS-DOCS-00036388 Global Vision Sys past invoices paid 12-
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Page 13 of 21

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IRS-DOCS-00036409
IRS-DOCS-00036410 IRS-DOCS-00036410 Invoice #34831 (National Aten Coin).pdf
IRS-DOCS-00036412 IRS-DOCS-00036412 Invoice #35256 (National Aten Coin).pdf
IRS-DOCS-00036413 IRS-DOCS-00036413 IRS-DOCS-00036414 IRS-DOCS-00036414
                                                                          Invoice #35461 (National Aten Coin).pdf
Invoice #35881 (National Aten Coin).pdf
IRS-DOCS-00036415 IRS-DOCS-00036415
                                                                           Invoice #36077 (National Aten Coin).pdf
IRS-DOCS-00036416 IRS-DOCS-00036416 IRS-DOCS-00036417 IRS-DOCS-00036417
                                                                           Invoice #36286 (National Aten Coin).pdf
Invoice #36836 (National Aten Coin).pdf
IRS-DOCS-00036418 IRS-DOCS-00036418 Invoice #37027 (National Aten Coin) pdf
IRS-DOCS-00036419 IRS-DOCS-00036419 IRS-DOCS-00036420 IRS-DOCS-00036420
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Invoice #37360 (National Aten Coin).pdf
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IRS-DOCS-00036421 IRS-DOCS-00036424
IRS-DOCS-00036425 IRS-DOCS-00036434 IRS-DOCS-00036435 IRS-DOCS-00036444
                                                                          20180831 10048.PDF
20181130 10190 Inv Summ.PDF
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Hoffman Inv, # 10008 (Accumulated Inv) 081318.PDF
Hoffman Invoice # 9939, 6-7-18.PDF
Hoffman Invoice for May 19 2018 foreign filling revised (2).pdf
Hoffman Patent Grp 4-19-18 20180321 9816.pdf
Hoffman Patent Grp 4-19-18 9860.pdf
IRS-DOCS-00036445 IRS-DOCS-00036462
IRS-DOCS-00036463
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IRS-DOCS-00036476
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IRS-DOCS-00036480
IRS-DOCS-00036502
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IRS-DOCS-00036516
IRS-DOCS-00036517 IRS-DOCS-00036517
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IRS-DOCS-00036518
IRS-DOCS-00036520
                                    IRS-DOCS-00036519
IRS-DOCS-00036521
                                                                           RE: $10K Wire successfully sent
RE: Whitaker Chalk retainer accounting
IRS-DOCS-00036522 IRS-DOCS-00036524
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IRS-DOCS-00036525
IRS-DOCS-00036528
                                    IRS-DOCS-00036527 Invoice- 231760 _1 _27985-00003.pdf IRS-DOCS-00036530 Invoice- 231336 _1 _27985-00003.pdf
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Invoice-_231259_1_27985-00001.pdf
Invoice-_231258_1_27985-00000.pdf
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IRS-DOCS-00036535
IRS-DOCS-00036537
                                    IRS-DOCS-00036536
IRS-DOCS-00036539
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Invoice-_229366_1_27985-00002.pdf
IRS-DOCS-00036540 IRS-DOCS-00036541
IRS-DOCS-00036542
IRS-DOCS-00036544
                                    IRS-DOCS-00036543
IRS-DOCS-00036546
                                                                           Invoice- 229355 1 27985-00001.pd
                                                                          AA Envelope Itr master for Vendors .docx
Black Gold invoices dated 7/31/18
IRS-DOCS-00036547 IRS-DOCS-00036548
IRS-DOCS-00036549
IRS-DOCS-00036551
                                    IRS-DOCS-00036550
IRS-DOCS-00036585
                                                                           Black Gold invoices.pdf
IRS-DOCS-00036586 IRS-DOCS-00036605
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IRS-DOCS-00036606
                                     IRS-DOCS-00036654
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                                                                           Cost portion of invoices 231760 to 233310.pdf
IRS-DOCS-00036655
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Invoice- 229919_1_27985-00000.pdf
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IRS-DOCS-00036675
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IRS-DOCS-00036676
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IRS-DOCS-00036681 IRS-DOCS-00036683 IRS-DOCS-00036684 IRS-DOCS-00036686
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Invoice-_231760_1_27985-00003.pdf
IRS-DOCS-00036687
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IRS-DOCS-00036693 IRS-DOCS-00036694 Invoice-_232057_1_27985-00002.pdf IRS-DOCS-00036695 IRS-DOCS-00036696 Invoice-_232283_1_27985-00003.pdf
IRS-DOCS-00036697
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IRS-DOCS-00036700
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IRS-DOCS-00036702 IRS-DOCS-00036704 Invoice_233308_1_27985-00005.pdf IRS-DOCS-00036705 IRS-DOCS-00036706 Invoice_233309_1_27985-00008.pdf
IRS-DOCS-00036705
IRS-DOCS-00036707
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IRS-DOCS-00036708
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IRS-DOCS-00036709 IRS-DOCS-00036710 Invoice- 233311 1 27985-00010.pdf IRS-DOCS-00036711 IRS-DOCS-00036713 Invoice- 233938 1 27985-00000.pdf
IRS-DOCS-00036714
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IRS-DOCS-00036717 IRS-DOCS-00036718 Invoice_233999 [27985-00007.pdf | IRS-DOCS-00036719 IRS-DOCS-00036720 Invoice_233400_1_27985-00005.pdf | IRS-DOCS-00036721 IRS-DOCS-00036723 IRS-DOCS-00036723 Invoice_234308_1_27985-00008.pdf
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Invoice-_234489_1_26485-00000.PDF
Invoice-_234891_1_27985-00000.pdf
Invoice-_234892_1_27985-00001.pdf
Fwd: June 25, 2018 - Re: 27985-00000 (Black Gold Coin, Inc.) (Payment Receipt)
27985-00000 Payment Receipt.pdf
IRS-DOCS-00036724 IRS-DOCS-00036725
                                     IRS-DOCS-00036728
IRS-DOCS-00036726
IRS-DOCS-00036729 IRS-DOCS-00036730
IRS-DOCS-00036731 IRS-DOCS-00036732 IRS-DOCS-00036733 IRS-DOCS-00036733
IRS-DOCS-00036734 IRS-DOCS-00036740 RE: Black Gold Coin, Inc, Invoices from Whitaker Chalk reconciliation IRS-DOCS-00036741 IRS-DOCS-00036750 Black Gold requested invoices.pdf
IRS-DOCS-00036751
                                     IRS-DOCS-00036756
                                                                           RE: Andrade Billing - all statements/invoices to date
IRS-DOCS-00036757
IRS-DOCS-00036758
                                    IRS-DOCS-00036757
IRS-DOCS-00036758
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Whitaker Chalk invoices dated 4/30/18
IRS-DOCS-00036759 IRS-DOCS-00036761 Invoice-_233938_1_27985-0000.pdf IRS-DOCS-00036762 IRS-DOCS-00036764 Invoice-_233939_1_27985-00001.pdf
IRS-DOCS-00036765
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Invoice-_233940_1_27985-00007.pdf
IRS-DOCS-00036767
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 IRS-DOCS-00036770 IRS-DOCS-00036771
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Invoice-_233310_1_27985-00009.pdf
Invoice-_233311_1_27985-00010.pdf
IRS-DOCS-00036772 IRS-DOCS-00036773
IRS-DOCS-00036774 IRS-DOCS-00036775
IRS-DOCS-00036776
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IRS-DOCS-00036778
                                     IRS-DOCS-00036778
                                                                           Whitaker Chalk Invoice log xlsx
IRS-DOCS-00036779 IRS-DOCS-00036780 IRS-DOCS-00036781 IRS-DOCS-00036829
                                                                           Whitaker Chalk invoices dated 10/31/18 (for Black Gold & NAC)
                                                                           Black Gold invoices.pdf
                                                                           Whitaker Chalk invoices dated 5/31/18
IRS-DOCS-00036830
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                                                                           Invoice-_234891_1_27985-0000.pdf
Invoice-_234892_1_27985-00001.pdf
 IRS-DOCS-00036831
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IRS-DOCS-00036834
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                                                                           Invoice-_234307_1_27985-00005.pdf
Invoice-_234308_1_27985-00008.pdf
IRS-DOCS-00036836
                                     IRS-DOCS-00036837
 IRS-DOCS-00036838
IRS-DOCS-00036841 IRS-DOCS-00036841
                                                                          Whitaker Chalk invoices dated 6/30/18
 RS-DOCS-00036842 IRS-DOCS-00036861 Black Gold invoices.pdf
RS-DOCS-00036862 IRS-DOCS-00036862 KR CPA: 9-14-18 NAC unpaid invoice log sheet
IRS-DOCS-00036842 IRS-DOCS-00036861
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IRS-DOCS-00036863 IRS-DOCS-00036863 09-14-18 NAC unpaid Invoice Log Sheet (from KR CPA) .pdf IRS-DOCS-00036864 IRS-DOCS-00036864 01-18 WF 9155 QB bnk reconcil 071118.pdf
IRS-DOCS-00036865 IRS-DOCS-00036867 01-18 WE chk acct stmt pdf
IRS-DOCS-00036868
IRS-DOCS-00036871
                                       IRS-DOCS-00036870
IRS-DOCS-00036873
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02-18 WF 9155 QB bnk reconcil 071118.pdf
IRS-DOCS-00036874 IRS-DOCS-00036879 02-18 WF chk acct stmt.pdf IRS-DOCS-00036880 IRS-DOCS-00036885 02-18 WF chk acct stmt.pdf
IRS-DOCS-00036886
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IRS-DOCS-00036889 IRS-DOCS-00036894
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03-18 WF chk acct stmt.pdf
 IRS-DOCS-00036895
                                        IRS-DOCS-00036900
IRS-DOCS-00036901 IRS-DOCS-00036903
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IRS-DOCS-00036904 IRS-DOCS-00036909 04-18 WF chk acct stmt.pdf
IRS-DOCS-00036910 IRS-DOCS-00036915 04-18 WF chk acct stmt.pdf
IRS-DOCS-00036916 IRS-DOCS-00036919 05-18 WF 9155 QB bnk reconcil 071118 pdf
IRS-DOCS-00036920
IRS-DOCS-00036928
                                       IRS-DOCS-00036927 05-18 WF chk acct stmt.pdf
IRS-DOCS-00036935 05-18 WF chk acct stmt.pdf
IRS-DOCS-00036936 IRS-DOCS-00036938 06-18 WF 9155 OB bnk reconcil 071118.pdf
IRS-DOCS-00036939 IRS-DOCS-00036943 06-18 WF chk acct stmt.pdf
IRS-DOCS-00036944 IRS-DOCS-00036948 06-18 WF chk acct stmt.pdf
| IRS-DOCS-00036949 | IRS-DOCS-00036949 | O7-18 Chk Register log .pdf | IRS-DOCS-00036950 | IRS-DOCS-00036950 | O7-18 PayPal Invoices pymnts .xlsx | IRS-DOCS-00036951 | IRS-DOCS-00036952 | O7-18 WF 9155 QB bnk reconcil 071118.pdf
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07-18 WF chk acct stmt.pdf
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IRS-DOCS-00036965
IRS-DOCS-00036971
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IRS-DOCS-00036971
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                                                                                August Invoices
                                                                               PayPal Invoices UT Updated.xlsx
da463432-c2b5-4332-9b3c-5b2905a57d75.pdf
IRS-DOCS-00036972 IRS-DOCS-00036972
IRS-DOCS-00036973 IRS-DOCS-00036978 IRS-DOCS-00036979 IRS-DOCS-00036979
                                                                                PayPal Invoices UT Updated.xlsx
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IRS-DOCS-00036980 IRS-DOCS-00036985
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IRS-DOCS-00036992
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IRS-DOCS-00036995 IRS-DOCS-00036996 IRS-DOCS-00036996
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February 2018 statement (004).xlsx
IRS-DOCS-00036997 IRS-DOCS-00036997
                                                                               February Paid Invoices.xlsx
NAC Foundation Paypal Payments
IRS-DOCS-00036998
IRS-DOCS-00036999
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IRS-DOCS-00036999
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IRS-DOCS-00037000 IRS-DOCS-00037001
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Paypal Pymts frm Melissa YTD 061718.xlsx
IRS-DOCS-00037002 IRS-DOCS-00037002 IRS-DOCS-00037003 IRS-DOCS-00037003
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IRS-DOCS-00037004 IRS-DOCS-00037004 IRS-DOCS-00037005 IRS-DOCS-00037005
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IRS-DOCS-00037007 IRS-DOCS-00037007 IRS-DOCS-00037008 IRS-DOCS-00037008
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Notes frm Phn Call With Melissa & others .docx
IRS-DOCS-00037009 IRS-DOCS-00037009
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Project for Coin totals 2015.xlsx
IRS-DOCS-00037010 IRS-DOCS-00037010 IRS-DOCS-00037011 IRS-DOCS-00037011
IRS-DOCS-00037012 IRS-DOCS-00037012 NAC 2015 QB Revenue Acct.xlsx
IRS-DOCS-00037012 IRS-DOCS-00037013 IRS-DOCS-00037014 IRS-DOCS-00037014
                                                                               Office Sqd Rpt-2014 Coin totals rec'd 020118 .xlsx
Office Sqd Rpt-2015 Coin totals rec'd 020118 .xlsx
IRS-DOCS-00037015 IRS-DOCS-00037015 Wire transfer to NAC Wells Fargo account
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IRS-DOCS-00037016
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01-04-19 NAC Check Register List (from KR CPA) .pdf
DIT Payment made todate as of 1-14-19.pdf
IRS-DOCS-00037018 IRS-DOCS-00037018
IRS-DOCS-00037019 IRS-DOCS-00037024 IRS-DOCS-00037025 IRS-DOCS-00037026 IRS-DOCS-00037026
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02-16-19 NAC unpaid Invoice Log Sheet (from KR CPA) .pdf
IRS-DOCS-00037027
IRS-DOCS-00037028
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IRS-DOCS-00037028
IRS-DOCS-00037029 IRS-DOCS-00037029
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1-18-19 NAC unpaid Invoice Log Sheet (from KR CPA) .pdf
IRS-DOCS-00037030 IRS-DOCS-00037031 IRS-DOCS-00037031
                                                                                Invoice Log Sheet .xlsx
                                                                               FW: URGENT - PLEASE READ Wire confirmation
Statement for Fintech Fund Family Limited As At 22Jan2019.pdf
RE: URGENT - PLEASE READ Wire confirmation
IRS-DOCS-00037032 IRS-DOCS-00037036 IRS-DOCS-00037037 IRS-DOCS-00037037
IRS-DOCS-00037038 IRS-DOCS-00037042
IRS-DOCS-00037043 IRS-DOCS-00037043 IRS-DOCS-00037044 IRS-DOCS-00037046 IRS-DOCS-00037054 IRS-DOCS-00037054
                                                                               Statement for Fintech Fund Family Limited As At 01Mar2019.pdf
RE: URGENT - PLEASE READ Wire confirmation
                                                                                Re: URGENT - PLEASE READ Wire confirmation
 IRS-DOCS-00037055 IRS-DOCS-00037055
                                                                                Statement for Fintech Fund Family Limited As At 01Mar2019.pdf
Statement for Fintech Fund Family Limited As At 22Jan2019.pdf
IRS-DOCS-00037056
                                       IRS-DOCS-00037056
IRS-DOCS-00037057 IRS-DOCS-00037059
                                                                                RE: Chetu Work Order - Adding 1 resource' is complete
IRS-DOCS-00037060 IRS-DOCS-00037061 IRS-DOCS-00037062 IRS-DOCS-00037062
                                                                                Invoice from Chetu
Inv_27486_from_Chetu_Inc._14340.pdf
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Invoice from Chetu
Inv_27204_from_Chetu_inc._8980.pdf
NAC_Foundations_LLC_WO.PDF
Re: Chetu Work Order - Adding 1 resource' is complete
Exhibit A Work Order 120418 NAC_Foundations_LLC_WO.PDF
IRS-DOCS-00037063 IRS-DOCS-00037064
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IRS-DOCS-00037110 IRS-DOCS-00037114 Inv 35128 10219.pdf
IRS-DOCS-00037115 IRS-DOCS-00037118 Inv 35129 10219.pdf IRS-DOCS-00037119 IRS-DOCS-00037121 Inv 35131 010219.pdf
IRS-DOCS-00037112 IRS-DOCS-00037121 Inv 35131 010219 .pdf
IRS-DOCS-00037122 IRS-DOCS-00037122 3-8-19 phn text messsage from Marcus .txt
IRS-DOCS-00037122 IRS-DOCS-00037123 Feb 20 to Feb 28 prorated invoice.pdf IRS-DOCS-00037126 IRS-DOCS-00037126 IRS-DOCS-00037126 IRS-DOCS-00037126 IRS-DOCS-00037126 IRS-DOCS-00037126 Feb 20 to Feb 28 prorated invoice.pdf
IRS-DOCS-00037127 IRS-DOCS-00037127 ATT00001.htm
IRS-DOCS-00037128 IRS-DOCS-00037129 Re: Invoice
| IRS-DOCS-00037128 | IRS-DOCS-00037130 | Re: Invoice | IRS-DOCS-00037131 | IRS-DOCS-00037131 | IRS-DOCS-00037142 | IRS-DOCS-00037142 | IRS-DOCS-00037142 | IRS-DOCS-00037142 | IRS-DOCS-00037152 | IRS-DOCS-00037152 | IRS-DOCS-00037154 | IRS-DOCS-00037164 | IRS-DOCS-0
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IRS-DOCS-00037184 IRS-DOCS-00037197 20190430 10369 PDF
IRS-DOCS-00037198
IRS-DOCS-00037199
                          IRS-DOCS-00037198
IRS-DOCS-00037207
                                                    Re: Billing Statement/Invoice
20190331 10296.PDF
IRS-DOCS-00037208 IRS-DOCS-00037208 Re: Billing Statement/Invoice IRS-DOCS-00037209 IRS-DOCS-00037218 20190321 10290.PDF
IRS-DOCS-00037209 IRS-DOCS-00037218 IRS-DOCS-00037219 IRS-DOCS-00037219
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IRS-DOCS-00037220 IRS-DOCS-00037233
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Alliance, LV NV office rent invoice.pdf
IRS-DOCS-00037234
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IRS-DOCS-00037235 IRS-DOCS-00037236
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IRS-DOCS-00037237 IRS-DOCS-00037237 IRS-DOCS-00037238 IRS-DOCS-00037238
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Fw: Scanned image from The Office Squad
                                                    The Office Squad.pdf
Las Vegas Office Rent Invoice
Alliance, LV NV office rent invoice.pdf
IRS-DOCS-00037239 IRS-DOCS-00037239
IRS-DOCS-00037240
IRS-DOCS-00037241
                         IRS-DOCS-00037240
IRS-DOCS-00037241
IRS-DOCS-00037242 IRS-DOCS-00037242
                                                    NAC PDF
IRS-DOCS-00037243 IRS-DOCS-00037244 IRS-DOCS-00037245 IRS-DOCS-00037245
                                                     Invoice 1016 from WeCode, LLC
                                                    Invoice_1016_from_WeCode_LLC.pdf
Invoice_1016_from_WeCode_LLC.pdf
01-19 Black Gold invoices.pdf
IRS-DOCS-00037246 IRS-DOCS-00037246 IRS-DOCS-00037247 IRS-DOCS-00037307
IRS-DOCS-00037308 IRS-DOCS-00037374
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IRS-DOCS-00037375 IRS-DOCS-00037445 IRS-DOCS-00037446 IRS-DOCS-00037447
                                                    041119 Black Gold invoices.pdf
Whitaker Chalk invoices dated 1/31/19
IRS-DOCS-00037448 IRS-DOCS-00037508 Black Gold invoices pdf
IRS-DOCS-00037509
IRS-DOCS-00037511
                         IRS-DOCS-00037500
IRS-DOCS-00037540
                                                    Whitaker Chalk invoices dated 12/31/18
                                                    Black Gold invoices.pdf
IRS-DOCS-00037541 IRS-DOCS-00037542
                                                    Whitaker Chalk invoices dated 2/28/19
IRS-DOCS-00037543
IRS-DOCS-00037610
                         IRS-DOCS-00037609
IRS-DOCS-00037611
                                                    Black Gold invoices.pdf
                                                    Whitaker Chalk invoices dated 3/31/19 (for Black Gold & NAC)
IRS-DOCS-00037612 IRS-DOCS-00037682
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IRS-DOCS-00037683
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                                                    02-16-19 NAC unpaid Invoice Log Sheet (from KR CPA) .pdf
03-01-19 NAC unpaid Invoice Log Sheet (from KR CPA) .pdf
03-15-19 NAC unpaid Invoice Log Sheet (from KR CPA) .pdf
IRS-DOCS-00037685
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IRS-DOCS-00037686
IRS-DOCS-00037687
                          IRS-DOCS-00037686
IRS-DOCS-00037687
                                                    1-18-19 NAC unpaid Invoice Log Sheet (from KR CPA). pdf
1-25-19 NAC unpaid Invoice Log Sheet (from KR CPA). pdf
1-31-19 NAC unpaid Invoice Log Sheet (from KR CPA). pdf
IRS-DOCS-00037688 IRS-DOCS-00037688
IRS-DOCS-00037689
IRS-DOCS-00037690
                         IRS-DOCS-00037689
IRS-DOCS-00037690
IRS-DOCS-00037691 IRS-DOCS-00037691
                                                    RE: Bank reversal
RE: Fund transfer approved regarding Block Bilts Capital $850K deposit and sale of coins
IRS-DOCS-00037692 IRS-DOCS-00037693 IRS-DOCS-00037693
                                                    [No Subject]
IRS-DOCS-00037694 IRS-DOCS-00037715
IRS-DOCS-00037716 IRS-DOCS-00037716
                                                    01-8 through 01-17.pdf
January 2018 NAC Chase Bank Statement
IRS-DOCS-00037717
                          IRS-DOCS-00037756
                                                    January 2018 statement.pdf
IRS-DOCS-00037757 IRS-DOCS-00037757 IRS-DOCS-00037758 IRS-DOCS-00037777
                                                    January 2018 statement (Reviewed).pdf
                                                    February 2018 statement.pdf
FW: Chase Bank Statement
IRS-DOCS-00037778 IRS-DOCS-00037779
IRS-DOCS-00037780
IRS-DOCS-00037781
                         IRS-DOCS-00037780
IRS-DOCS-00037781
                                                    Feb & March 2018.xlsx
NAC February Bank Statement
IRS-DOCS-00037782 IRS-DOCS-00037801
                                                    February 2018 statement.pdf
IRS-DOCS-00037802 IRS-DOCS-00037802 IRS-DOCS-00037803 IRS-DOCS-00037803
                                                     Wire transfer to NAC 4-11-18.pdf
                                                    Wire transfer to NAC
IRS-DOCS-00037804 IRS-DOCS-00037804
                                                    Wire transfer to NAC 4-11-18.pdf
IRS-DOCS-00037805
                          IRS-DOCS-00037808
                                                     March 2018 statement.pdf
IRS-DOCS-00037809
                          IRS-DOCS-00037809
                                                    RF: Chase Bank Statement
IRS-DOCS-00037810 IRS-DOCS-00037829 IRS-DOCS-00037830 IRS-DOCS-00037833
                                                    February 2018 statement.pdf
                                                    March 2018 statement.pdf
IRS-DOCS-00037834
                          IRS-DOCS-00037835
                                                    April 2018 statement pdf
IRS-DOCS-00037836
IRS-DOCS-00037856
                          IRS-DOCS-00037855
IRS-DOCS-00037895
                                                    February 2018 statement.pdf
January 2018 statement.pdf
                                                    July 2018 statement.pdf
IRS-DOCS-00037896 IRS-DOCS-00037897
IRS-DOCS-00037898 IRS-DOCS-00037899 June 2018 statement.pdf
IRS-DOCS-00037900 IRS-DOCS-00037903 March 2018 statement.pdf
IRS-DOCS-00037904 IRS-DOCS-00037905 IRS-DOCS-00037906 IRS-DOCS-00037906
                                                    May 2018 statement.pdf
RE: Chase IOLTA bank statements
IRS-DOCS-00037907
                          IRS-DOCS-00037908
                                                    July 2018 statement.pdf
IRS-DOCS-00037909 IRS-DOCS-00037910 IRS-DOCS-00037911 IRS-DOCS-00037912
                                                    June 2018 statement.pdf
May 2018 statement.pdf
IRS-DOCS-00037913 IRS-DOCS-00037914
                                                    April 2018 statement.pdf
RE: ICO Documents
IRS-DOCS-00037915 IRS-DOCS-00037916
IRS-DOCS-00037917
                          IRS-DOCS-00037918
                                                    May 2018 statement.pdf
                                                    April 2018 statement.pdf
February 2018 statement.pdf
IRS-DOCS-00037919 IRS-DOCS-00037920
IRS-DOCS-00037911
IRS-DOCS-00037921
IRS-DOCS-00037941
                         IRS-DOCS-00037940
IRS-DOCS-00037980
                                                    January 2018 statement.pdf
IRS-DOCS-00037981 IRS-DOCS-00037982
                                                    July 2018 statement.pdf
                          IRS-DOCS-00037984
IRS-DOCS-00037983
                                                     June 2018 statement.pdf
                                                    March 2018 statement pdf
IRS-DOCS-00037985
                          IRS-DOCS-00037988
IRS-DOCS-00037989 IRS-DOCS-00037989 01-22-18.xlsx
                                                                                                                                                                                                                                                      43122
IRS-DOCS-00037991
                          IRS-DOCS-00037991
                                                                                                                                                                                                                                                     43124
IRS-DOCS-00037992
                          IRS-DOCS-00037992
                                                    01-24-18.xlsx
IRS-DOCS-00037993
                          IRS-DOCS-00037993
                                                    01-17-18 Deposits
IRS-DOCS-00037994
                          IRS-DOCS-00037994
                                                    1-17-18.xlsx
IRS-DOCS-00037995
IRS-DOCS-00037996
                         IRS-DOCS-00037995
IRS-DOCS-00037996 01-19-18.xlsx
                                                                                                                                                                                                                                                      43119
IRS-DOCS-00037997
                         IRS-DOCS-00037997
                                                                                                                                                                                                                                                     43123
IRS-DOCS-00037998
                          IRS-DOCS-00037998
                                                    01-23-18.xlsx
IRS-DOCS-00037999
                          IRS-DOCS-00037999
                                                    1/12/18 tracking
IRS-DOCS-00038000
IRS-DOCS-00038001
                         IRS-DOCS-00038000
IRS-DOCS-00038001
                                                     1-12-18.xlsx
                                                     1/9/18 bank record
IRS-DOCS-00038002 IRS-DOCS-00038002
                                                    1-9-18.csv
IRS-DOCS-00038003
                          IRS-DOCS-00038003
                                                                                                                                                                                                                                                     43110
IRS-DOCS-00038004
                          IRS-DOCS-00038004
                                                    1-10-18.csv
IRS-DOCS-00038005
                          IRS-DOCS-00038005
                                                                                                                                                                                                                                                     43111
IRS-DOCS-00038006
                          IRS-DOCS-00038006
                                                     1-11-18.csv
IRS-DOCS-00038007
                          IRS-DOCS-00038007
                                                    100 Invoices
                                                    INVOICED_1-8__1-17_ HL.xlsx
AML_100INVOICES_.pdf
IRS-DOCS-00038008 IRS-DOCS-00038008
IRS-DOCS-00038009
                          IRS-DOCS-00038248
IRS-DOCS-00038249
                          IRS-DOCS-00038249
                                                    bank statement
IRS-DOCS-00038250
IRS-DOCS-00038251
                         IRS-DOCS-00038250
IRS-DOCS-00038251
                                                     1-8-18.csv
                                                     1-10-18.csv
IRS-DOCS-00038252
                          IRS-DOCS-00038252
                                                    Confirmation of Wire Transfer to Frames Per Second Prod.
IRS-DOCS-00038253
                          IRS-DOCS-00038255
                                                    01-22-18 Frames Per Second Productions.pdf
IRS-DOCS-00038256
                          IRS-DOCS-00038256
                                                    FW: Trust Account Agreement
IRS-DOCS-00038257
                          IRS-DOCS-00038259
                                                    Trust Account Agreement.docx
IRS-DOCS-00038260 IRS-DOCS-00038261
                                                     Fwd: FW: Wire Info
IRS-DOCS-00038262 IRS-DOCS-00038262 RE: 1-11-18
IRS-DOCS-00038263 IRS-DOCS-00038263 RE: Deposits 1/16/18 IRS-DOCS-00038264 IRS-DOCS-00038264 1-16-18.xlsx
```

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      IRS-DOCS-00038265
      IRS-DOCS-00038266
      Re: Follow up: request 3rd sample of Invoices report.

      IRS-DOCS-00038267
      IRS-DOCS-00038294
      INVOICES_PDFs_ADDITION.pdf

      IRS-DOCS-00038295
      IRS-DOCS-00038295
      RE: Release funds from NAC's trust bank acct to NAC's Wells Fargo Acct.

IRS-DOCS-00038296
IRS-DOCS-00038297
                                            IRS-DOCS-00038296
IRS-DOCS-00038297
                                                                                          Weekly conclusion ltr to David Solmon, Wk end 011718 issued 012518.pdf
                                                                                         RE: Trust Account Agreement
IRS-DOCS-00038298 IRS-DOCS-00038298
                                                                                         Re: Wire transfer instructions
 IRS-DOCS-00038299
                                             IRS-DOCS-00038299
                                                                                         Update
                                                                                         Wire transfer instructions
IRS-DOCS-00038300
                                            IRS-DOCS-00038300
IRS-DOCS-00038301 IRS-DOCS-00038301
                                                                                        Wire Transfer instructions.pdf
Wire Transfer of
 IRS-DOCS-00038302
                                             IRS-DOCS-00038302
                                                                                        0INVOICES KR F14.xlsx
IRS-DOCS-00038303 IRS-DOCS-00038303
IRS-DOCS-00038304
IRS-DOCS-00038358
                                           IRS-DOCS-00038357
IRS-DOCS-00038385
                                                                                        2nd INVOICES_PDFs rec'd 1-24-18.pdf
3rd additional samople INVOICES_PDFs_ADDITION.pdf
IRS-DOCS-00038386 IRS-DOCS-00038386 AML_FEB_ALL_FINAL_V2 rec'd 3-6-18.xlsx
IRS-DOCS-00038387
IRS-DOCS-00038388
                                           IRS-DOCS-00038387
IRS-DOCS-00038389
                                                                                        Copy of INVOICES_CREDIT_ KR_J8-J17.xlsx
Invoice INV-4781.pdf
| IRS-DOCS-00038390 | IRS-DOCS-00038390 | INVOICED_1-18_1-25_xlsx | IRS-DOCS-00038391 | IRS-DOCS-00038391 | INVOICED_1-26_1-31_xlsx | IRS-DOCS-00038392 | IRS-DOCS-000
IRS-DOCS-00038393 IRS-DOCS-00038393 IRS-DOCS-00038394 IRS-DOCS-00038394
                                                                                        INVOICED_1-0__1-17__xisx
INVOICED_2-1__2-14__xisx
INVOICED_2-1__2-9__xisx
INVOICES_KR_3.2.xisx
IRS-DOCS-00038395 IRS-DOCS-00038395
IRS-DOCS-00038396
IRS-DOCS-00038438
                                           IRS-DOCS-00038437
IRS-DOCS-00038459
                                                                                         KR_INVpdfsTest_Feb1.pdf
KR_INVpdfsTest_Feb10-Feb15.pdf
IRS-DOCS-00038460 IRS-DOCS-00038553
                                                                                         PDFCOPIES 1-25wkEND KR1.pdf
IRS-DOCS-00038554
IRS-DOCS-00038555
                                           IRS-DOCS-00038554
IRS-DOCS-00038555
                                                                                         RE: ICO Documents
INVOICED_2-1__2-9_.xlsx
                                                                                        INVOICED_2-1__2-14_.xlsx
INVOICES_KR_3.2.xlsx
IRS-DOCS-00038556 IRS-DOCS-00038556
IRS-DOCS-00038557 IRS-DOCS-00038557 IRS-DOCS-00038558 IRS-DOCS-00038599
                                                                                         KR INVpdfsTest Feb1.pdf
                                           IRS-DOCS-00038621 KR_INVpdfsTest_Feb10-Feb15.pdf
IRS-DOCS-00038715 PDFCOPIES_1-25wkEND_KR1.pdf
IRS-DOCS-00038716 0INVOICES_KR_F14.xlsx
IRS-DOCS-00038600 IRS-DOCS-00038621
IRS-DOCS-00038622
IRS-DOCS-00038716
IRS-DOCS-00038717 | IRS-DOCS-00038770 | Znd INVOICES_PDFs_rec'd 1-24-18.pdf | IRS-DOCS-00038771 | IRS-DOCS-00038798 | 3rd additional samople INVOICES_PDFs_ADDITION.pdf
IRS-DOCS-00038799 IRS-DOCS-00038799 AML FEB ALL FINAL V2 rec'd 3-6-18.xlsx
IRS-DOCS-00038800
IRS-DOCS-00038801
                                           IRS-DOCS-00038800
IRS-DOCS-00038802
                                                                                        Copy of INVOICES_CREDIT_ KR_J8-J17.xlsx
Invoice INV-4781.pdf
| IRS-DOCS-00038803 | IRS-DOCS-00038803 | INVOICED_1-8_1-1-7_xlsx | IRS-DOCS-00038804 | IRS-DOCS-00038804 | IRS-DOCS-00038805 
IRS-DOCS-00038806 IRS-DOCS-00038806 2015 Client List Updated 06.09.15.xlsx IRS-DOCS-00038807 IRS-DOCS-00038807 aten coins 2014 YE sale wk sht PBC 022615.xlsx
IRS-DOCS-00038808 IRS-DOCS-00038816 BPR 21.666.pdf
IRS-DOCS-00038817 IRS-DOCS-00038819 BPR 33,000.pdf IRS-DOCS-00038820 IRS-DOCS-00038829 BRM 20,000.pdf
IRS-DOCS-00038830 IRS-DOCS-00038839 BRM 25,000.pdf
IRS-DOCS-00038840 IRS-DOCS-00038845 IRS-DOCS-00038849 IRS-DOCS-00038849
                                                                                         BRM 33,000.pdf
BRM 33,333.pdf
IRS-DOCS-00038850 IRS-DOCS-00038856
                                                                                         BRM 34,000.pdf
IRS-DOCS-00038857 IRS-DOCS-00038858 Fwd: Introduction IRS-DOCS-00038859 IRS-DOCS-00038859 IMG_2080 (1).jpg
IRS-DOCS-00038860 IRS-DOCS-00038860 IMG_2080.jpg
IRS-DOCS-00038861 IRS-DOCS-00038869 BPR 21,666.pdf
IRS-DOCS-00038870 IRS-DOCS-00038872
                                                                                         BPR 33,000.pdf
IRS-DOCS-00038873 IRS-DOCS-00038882 IRS-DOCS-00038883 IRS-DOCS-00038892
                                                                                        BRM 20,000.pdf
BRM 25,000.pdf
IRS-DOCS-00038893 IRS-DOCS-00038898
                                                                                         BRM 33,000 pdf
IRS-DOCS-00038899
IRS-DOCS-00038903
                                           IRS-DOCS-00038902
IRS-DOCS-00038909
                                                                                        BRM 33,333.pdf
BRM 34,000.pdf
                                                                                        Intro.pdf
Hoff contracts per 9-10-18 email compared to log sheets .xlsx
IRS-DOCS-00038910 IRS-DOCS-00038911
IRS-DOCS-00038912 IRS-DOCS-00038912 Hoff cont
IRS-DOCS-00038913 IRS-DOCS-00038914 Intro.pdf
IRS-DOCS-00038915 IRS-DOCS-00038916 RE: Hoff, Tyler,Bar Punch Ranch, Hoff Enterprise Token sales IRS-DOCS-00038917 IRS-DOCS-00038917 IRS-DOCS-00038917 aten coins 2014 YE sale wk sht PBC 022615.xlsx
IRS-DOCS-00038918 IRS-DOCS-00038918
                                                                                         aten coins 2014 YE sale wk sht PBC 022615.xlsx
IRS-DOCS-00038919 IRS-DOCS-00038919 Hoff contracts per 9-10-18 email compared to log sheets .xlsx IRS-DOCS-00038920 IRS-DOCS-00038920 01-18-18.xlsx
IRS-DOCS-00038921 IRS-DOCS-00038921 01-19-18.xlsx
 IRS-DOCS-00038922
                                            IRS-DOCS-00038922
                                                                                         01-22-18.xlsx
IRS-DOCS-00038923
                                            IRS-DOCS-00038923
                                                                                         01-23-18.xlsx
 IRS-DOCS-00038924 IRS-DOCS-00038924 01-24-18 xlsx
IRS-DOCS-00038925
IRS-DOCS-00038926
                                           IRS-DOCS-00038925 01-25-18 (Rev
IRS-DOCS-00038926 01-25-18.xlsx
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IRS-DOCS-00038927 IRS-DOCS-00038927 01-29-18 xlsx
                                             IRS-DOCS-00038928
 IRS-DOCS-00038928
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IRS-DOCS-00038929 IRS-DOCS-00038929
                                                                                         01-31-18.xlsx
IRS-DOCS-00038930 IRS-DOCS-00038930 IRS-DOCS-00038931 IRS-DOCS-00038931
                                                                                         02-01-18.xlsx
                                                                                         02-02-18.xlsx
IRS-DOCS-00038932 IRS-DOCS-00038932 02-05-18 xlsx
 IRS-DOCS-00038933 IRS-DOCS-00038933
                                                                                         02-06-18.xlsx
IRS-DOCS-00038934
                                            IRS-DOCS-00038934
                                                                                         02-07-18.xlsx
 IRS-DOCS-00038935 IRS-DOCS-00038935
                                                                                         02-08-18 xlsx
IRS-DOCS-00038936
IRS-DOCS-00038937
                                           IRS-DOCS-00038936 02-09-18.xlsx
IRS-DOCS-00038937 02-12-18.xlsx
IRS-DOCS-00038938 IRS-DOCS-00038938 02-13-18.xlsx
IRS-DOCS-00038939 IRS-DOCS-00038939 02-14-18.xlsx
IRS-DOCS-00038940 IRS-DOCS-00038940 02-15-18.xlsx
IRS-DOCS-00038941 IRS-DOCS-00038941 02-16-18.xisx
IRS-DOCS-00038942 IRS-DOCS-00038942 02-20-18 1.xisx
IRS-DOCS-00038943 IRS-DOCS-00038943 02-21-18.xlsx
 IRS-DOCS-00038944
                                            IRS-DOCS-00038944
                                                                                         03-02-18.xlsx
IRS-DOCS-00038945
                                            IRS-DOCS-00038945
                                                                                         1-10-18.xlsx
IRS-DOCS-00038946 IRS-DOCS-00038946
                                                                                          1-11-18 xlsx
 IRS-DOCS-00038947
                                             IRS-DOCS-00038947
                                                                                          1-12-18.xlsx
IRS-DOCS-00038948 IRS-DOCS-00038948
                                                                                         1-16-18 (Reviewed).xlsx
 IRS-DOCS-00038949 IRS-DOCS-00038949
                                                                                         1-16-18.xlsx
 IRS-DOCS-00038950
                                             IRS-DOCS-00038950
                                                                                          1-17-18.xlsx
IRS-DOCS-00038951
                                            IRS-DOCS-00038951
                                                                                          1-26-18 xlsx
IRS-DOCS-00038952 IRS-DOCS-00038952 IRS-DOCS-00038953 IRS-DOCS-00038953
                                                                                          1-8-18.xlsx
                                                                                         1-9-18.xlsx
IRS-DOCS-00038954
                                            IRS-DOCS-00038954
                                                                                         2-23 through 2-28 xlsx
                                                                                        Accum tracking 1.xlsx
01-8 through 01-17.pdf
NAC PR Serv WF bnk dep frm Chase C-Chk 012618.pdf
 IRS-DOCS-00038955
                                            IRS-DOCS-00038955
IRS-DOCS-00038956
                                             IRS-DOCS-00038977
 IRS-DOCS-00038978 IRS-DOCS-00038979
 IRS-DOCS-00038980 IRS-DOCS-00038980
                                                                                          Re: Requiring prompt reply regarding depositing funds to NAC Payroll Services, Inc. bank acct.
IRS-DOCS-00038981 IRS-DOCS-00038981 Re: Bank Details and Disclaimer
 IRS-DOCS-00038982 IRS-DOCS-00038982 Wire Transfer instructions.pdf
IRS-DOCS-00038983 IRS-DOCS-00038983 RE: contact information
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| IRS-DOCS-00038984 | IRS-DOCS-00038984 | AML BitCoin: February Invoices | IRS-DOCS-00038985 | IRS-DOCS-00038985 | February 2018 statement (004).xlsx
IRS-DOCS-00038986 IRS-DOCS-00038986 February Paid Invoices xlsx
IRS-DOCS-00038987
IRS-DOCS-00038988
                                                           IRS-DOCS-00038987
IRS-DOCS-00038988
                                                                                                                         February 2018 statement (004)PBC Melissa 042018.xlsx
February Paid InvoicesPBC Melissa 042018.xlsx
IRS-DOCS-00038989 IRS-DOCS-00038989
                                                                                                                         FW: AML BitCoin: February Invoices
IRS-DOCS-00038990
IRS-DOCS-00038991
                                                            IRS-DOCS-00038990
                                                                                                                         February 2018 statement (004).xlsx
                                                            IRS-DOCS-00038991
                                                                                                                         February Paid Invoices.xlsx
IRS-DOCS-00038992 IRS-DOCS-00038992
                                                                                                                         Jan 2018 invoice to bnk stmt reconci Dylan phn call 020618.xlsx
Weekly conclusion Itr to David Solmon, to release funds as of 2-9-18 .docx
 IRS-DOCS-00038993
                                                                                                                        OINVOICES_KR_F14.xlsx
February 01 - February 09 'ZERO Balance' Invoices
OINVOICES_KR_F14.xlsx
IRS-DOCS-00038994 IRS-DOCS-00038994
IRS-DOCS-00038995 IRS-DOCS-00038995 IRS-DOCS-00038996 IRS-DOCS-00038996
IRS-DOCS-00038997 IRS-DOCS-00038997
                                                                                                                         INV 4781 - Robert Farr PDF
IRS-DOCS-00038998 IRS-DOCS-00038999 IRS-DOCS-00039000 IRS-DOCS-00039001
                                                                                                                         Invoice INV-4781.pdf
Invoice INV-4781.pdf
IRS-DOCS-00039002 IRS-DOCS-00039043
                                                                                                                        KR_INVpdfsTest_Feb1.pdf
Provide invoices from the following list for February 01 - February 09 'ZERO Balance' Invoices
IRS-DOCS-00039044 IRS-DOCS-00039044 IRS-DOCS-00039045
                                                                                                                         Sample invoice with zero balance list as of 2-9-18.pdf
IRS-DOCS-00039046 IRS-DOCS-00039046 IRS-DOCS-00039047 IRS-DOCS-00039047
                                                                                                                        Sample invoice with zero balance list as of 2-9-18.pdf
Week ending 2-9 distribution from IOLTA trust account
IRS-DOCS-00039048 IRS-DOCS-00039048
                                                                                                                         Weekly conclusion Itr to David Solmon, to release funds as of 2-9-18 .pdf
IRS-DOCS-00039049 IRS-DOCS-00039049 IRS-DOCS-00039050 IRS-DOCS-00039050
                                                                                                                         Weekly conclusion Itr to David Solmon, to release funds as of 2-9-18 .docx
Weekly conclusion Itr to David Solmon, to release funds as of 2-9-18 .pdf
| IRS-DOCS-00039051 | IRS-DOCS-00039072 | 01-8 through 01-17 bnk register from Sheila .pdf | IRS-DOCS-00039073 | IRS-DOCS-00039312 | AML_100INVOICES 012218.pdf | IRS-DOCS-00039313 | IRS-DOCS-00039552 | AML_100INVOICES_.pdf
                                                                                                                        Dylan-Inv to bnk stmt reconil Wk end 1-17 emailed 012318 .xlsx Inv to bnk stmt reconil Wk end 1-17.xlsx INVOICED_1-8__1-17_xlsx
IRS-DOCS-00039553 IRS-DOCS-00039553
IRS-DOCS-00039554
IRS-DOCS-00039555
                                                           IRS-DOCS-00039554
IRS-DOCS-00039555
IRS-DOCS-00039556 IRS-DOCS-00039557
                                                                                                                         Re: Introduction and request first Invoice.com report.
IRS-DOCS-00039558
                                                                                                                         ACCT_CHASEBANK.xlsx
                                                            IRS-DOCS-00039558
IRS-DOCS-00039559
                                                            IRS-DOCS-00039559 INVOICED 1-8 1-17 xlsx
                                                                                                                        2nd INVOICES_PDFs rec'd 1-24-18.pdf
3rd additional samople INVOICES_PDFs_ADDITION.pdf
IRS-DOCS-00039560 IRS-DOCS-00039613 IRS-DOCS-00039614 IRS-DOCS-00039641
IRS-DOCS-00039642 IRS-DOCS-00039642 Copy of INVOICES_CREDIT_KR_J8-J17.xlsx
IRS-DOCS-00039643 IRS-DOCS-00039643 RS-DOCS-00039644 RS-DOCS-00039644 RS-DOCS-00039644 RS-DOCS-00039647 Re: Follow up: request 2nd sample of Invoices report.
IRS-DOCS-00039648 IRS-DOCS-00039648 INVOICES_CREDIT_ KR_J8-J17.xlsx
IRS-DOCS-00039649 IRS-DOCS-00039702 IRS-DOCS-00039703 IRS-DOCS-00039704
                                                                                                                        INVOICES_PDFs.pdf
Re: Follow up: request 3rd sample of Invoices report.
                                                                                                                        INVOICES_PDFs_ADDITION.pdf
Release funds from NAC's trust bank acct to NAC's Wells Fargo Acct.
NAC's funds transfer letter to NAC's WF bank acct for period activity 1-8 to 1-17-18 012518 .docx
IRS-DOCS-00039705 IRS-DOCS-00039732 IRS-DOCS-00039733 IRS-DOCS-00039733
IRS-DOCS-00039734 IRS-DOCS-00039734
IRS-DOCS-00039735 IRS-DOCS-00039735 IRS-DOCS-00039736 IRS-DOCS-00039737 IRS-DOCS-00039737 IRS-DOCS-00039737
                                                                                                                        Weekly conclusion Itr to David Solmon, Wk end 011718 issued 012518.pdf
Sample Invoice to bank stmt reconcile Wk end 1-17, 011918.pdf
                                                                                                                        Sample of AML Token weekly report
Sample Invoice to bank stint reconcile Wk end 1-17, 011918.pdf
Weekly conclusion Itr to David Solmon, Wk end 011718 issued 012518.docx
IRS-DOCS-00039738 IRS-DOCS-00039739 IRS-DOCS-00039739
IRS-DOCS-00039740 IRS-DOCS-00039740
                                                                                                                         Block Bits Capital Transfer
IRS-DOCS-00039741 IRS-DOCS-00039742 IRS-DOCS-00039743 IRS-DOCS-00039744
                                                                                                                        Invoice INV-3298.pdf
$850K Inv for Block Capital Inv #3298, 013118.pdf
IRS-DOCS-00039745 IRS-DOCS-00039745 $850K,conclusion ltr to David Solmon, Wk end 01-25-18issued 013118.docx IRS-DOCS-00039746 IRS-DOCS-00039745 IRS-DOCS-00039746 IRS-DOCS-000
                                                           IRS-DOCS-00039746
IRS-DOCS-00039747
IRS-DOCS-00039746
IRS-DOCS-00039747
                                                                                                                         Fwd: Block Bits Capital Transfer
IRS-DOCS-00039741 IRS-DOCS-00039749 IRS-DOCS-00039750 IRS-DOCS-00039751 IRS-DOCS-00039751
                                                                                                                        Invoice INV-3298.pdf
Invoices Wk End 1-25-18 selected to review 012918.pdf
                                                                                                                        Provide PDF Invoices for Wk Ending 1-25-18 Excel Invoice sht rec'd 013118.pdf
Re: Weekly information for coin invoice report from 1/18 to 1/25
INVOICES_KR_3.2.xlsx
IRS-DOCS-00039752
IRS-DOCS-00039754
                                                           IRS-DOCS-00039753
IRS-DOCS-00039754
                                                                                                                        Fund transfer approved regarding Block Bilts Capital $850K deposit and sale of coins. PDFCOPIES_1-25wkEND_KR.pdf PDFCOPIES_1-25wkEND_KR1.pdf
IRS-DOCS-00039755 IRS-DOCS-00039755
IRS-DOCS-00039756 IRS-DOCS-00039849 IRS-DOCS-00039850 IRS-DOCS-00039943
                                                                                                                        Revised INVOICES_list KR .xlsx
INVOICES_list wk end 1-31-18, from Dylan 020218.xlsx
KR_INVOICES_J31_pdf
IRS-DOCS-00039944 IRS-DOCS-00039944 IRS-DOCS-00039945 IRS-DOCS-00039945
IRS-DOCS-00039946
                                                            IRS-DOCS-00039947
                                                                                                                       KR_INVOICES_J31_pdf
AML_FEB_ALL_FINAL_V2.XIsx
OINVOICES_KR_F16.xisx
Provide invoices from the following list for February 10 - February 15 'ZERO Balance' Invoices
Sample invoice with zero balance list as of 2-15-18.pdf
| IRS-DOCS-00039948 | IRS-DOCS-00039948 | IRS-DOCS-00039949 | IRS-DOCS-00039949 | IRS-DOCS-00039950 | IRS-
IRS-DOCS-00039951 IRS-DOCS-00039951
IRS-DOCS-00039952
                                                            IRS-DOCS-00039952
                                                                                                                        Re: Provide invoices from the following list for February 01 - February 09 'ZERO Balance' Invoices KR_INVpdfsTest_Feb1.pdf
0INVOICES_KR_F16.xlsx
IRS-DOCS-00039953 IRS-DOCS-00039954
IRS-DOCS-00039955
IRS-DOCS-00039997
                                                           IRS-DOCS-00039996
IRS-DOCS-00039997
                                                                                                                        Re: Provide invoices from the following list for February 10 - February 15 'ZERO Balance' Invoices 
KR_INVpdfsTest_Feb10-Feb15.pdf 
Sample invoice with zero balance list as of 2-15-18.pdf
IRS-DOCS-00039998 IRS-DOCS-00039998
IRS-DOCS-00039999 IRS-DOCS-00040020 IRS-DOCS-00040021 IRS-DOCS-00040021
| IRS-DOCS-00040021 | IRS-DOCS-00040022 | IRS-DOCS-00040023 | IRS-DOCS-00040023 | IRS-DOCS-00040024 | IRS-
                                                                                                                        Week ending 2-15 distribution from IOLTA trust account to NAC WF acct.
Weekly conclusion lit to David Solmon, to release funds as of 2-15-18.pdf
Weekly conclusion lit to David Solmon, to release funds as of 2-15-18.docx
 IRS-DOCS-00040025 IRS-DOCS-00040025
                                                                                                                         Weekly conclusion ltr to David Solmon, to release funds as of 2-15-18 .pdf
IRS-DOCS-00040026
                                                            IRS-DOCS-00040026
                                                                                                                         All Jan Zero Bal as of 1-31-18 rec'd 0020718 .xlsx
| IRS-DOCS-00040027 | IRS-DOCS-00040026 | IRS-DOCS-00040027 | ALL January Zero Balance | IRS-DOCS-00040027 | IRS-DOCS-00040028 | IRS-DOCS-00040028 | IRS-DOCS-00040028 | IRS-DOCS-00040028 | IRS-DOCS-00040024 | IRS-DOCS-000400142 | IRS-DOCS-000400143 | IRS-DOCS-000400145 | IRS-DOCS-00040145 | IRS-DOCS-00040258 | IRS-DOCS-00040258 | IRS-DOCS-00040259 | IRS-DOCS-00040
IRS-DOCS-00040261 IRS-DOCS-00040261 IRS-DOCS-00040262 IRS-DOCS-00040262
                                                                                                                         INVOICES_KR_3.2.xlsx
                                                                                                                         Request PDF copy for the following Invoices
IRS-DOCS-00040263 IRS-DOCS-00040264
                                                                                                                         Sample trans to test from 1-12 to 1-31-18, 020718.pdf
 IRS-DOCS-00040265 IRS-DOCS-00040266
                                                                                                                         Sample trans to test from 1-12 to 1-31-18, 020718.pdf
IRS-DOCS-00040267
                                                            IRS-DOCS-00040267
                                                                                                                         [No Subject]
                                                                                                                         Weekly conclusion Itr to David Solmon, remaining Jan ended 1-31 020918 .pdf
Weekly conclusion Itr to David Solmon, remaining Jan ended 1-31 020918 .pdf
IRS-DOCS-00040268 IRS-DOCS-00040268
  IRS-DOCS-00040269 IRS-DOCS-00040269
IRS-DOCS-00040270 IRS-DOCS-00040270
                                                                                                                         Weekly conclusion Itr to David Solmon, remaining Jan ended 1-31 020918.docx
                                                                                                                        FW: NAC Banking Resolution
NAC BANKING RESOLUTION_3-12-18.pdf
IRS-DOCS-00040271 IRS-DOCS-00040271
 IRS-DOCS-00040272
                                                            IRS-DOCS-00040272
IRS-DOCS-00040273 IRS-DOCS-00040273
                                                                                                                         TSINVOICE1.pdf
IRS-DOCS-00040274 IRS-DOCS-00040274 NAC BANKING RESOLUTION_3-12-18.pdf
IRS-DOCS-00040275 IRS-DOCS-00040275 Accreditation Letter frm Phil atty 111814.rtf
IRS-DOCS-00040276 IRS-DOCS-00040278
                                                                                                                         Accreditation letter Notes 111814.docx
IRS-DOCS-00040279 IRS-DOCS-00040279 IRS-DOCS-00040280 IRS-DOCS-00040280
                                                                                                                         Philip Racusin accredited investor letter
                                                                                                                         Accreditation Letter.rtf
 IRS-DOCS-00040281 IRS-DOCS-00040281
                                                                                                                         RE: Accreditation Letter for BGC International, Inc.
| IRS-DOCS-00040281 | IRS-DOCS-00040282 | RE: Sample | IRS-DOCS-00040283 | IRS-DOCS-00040283 | Return Call | IRS-DOCS-00040284 | RS-DOCS-00040284 | Sample Accr
                                                                                                                         RE: Sample Accreditation Itr
  IRS-DOCS-00040284 IRS-DOCS-00040284 Sample Accreditation Letter IRS-DOCS-00040285 Accreditation Letter.rtf
```

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| IRS-DOCS-00040286 | IRS-DOCS-00040288 | IRS-DOCS-00040299 | IRS-DOCS-00040297 | IRS-DOCS-00040297 |
                                                                                      Aten Coin Launch.pdf
BGC- The Revolution.pdf
                                                                                       [Highrise] Note about CALE FORM
IRS-DOCS-00040297
IRS-DOCS-00040298
IRS-DOCS-00040299
                                           IRS-DOCS-00040298
IRS-DOCS-00040299
                                                                                        [Highrise] Note about CERTIFICATE OF PERIODIC REVIEW
[Highrise] Note about CERTIFICATE OF An Apoption of Anti-Money Laundering Compliance Program
                                                                                        | Highrise | Note about Designation of Anti-Money Laundering Compliance Officer | Highrise | Note about Exchange Agreement 2015 | Highrise | Note about NAC AML COMPLIANCE PROGRAM
IRS-DOCS-00040300 IRS-DOCS-00040300
IRS-DOCS-00040301
IRS-DOCS-00040302
                                            IRS-DOCS-00040301
                                           IRS-DOCS-00040302
                                                                                        [Highrise] Note about NAC COMPLIANCE GUIDE
[Highrise] Note about NAC Policies & Procedures
[Highrise] Note about VALIDATION & QUALITY ASSURANCE FORM
IRS-DOCS-00040303 IRS-DOCS-00040303
 IRS-DOCS-00040304
IRS-DOCS-00040305 IRS-DOCS-00040305
                                                                                      [Highrise] Note about VALIDATION & QUALITY ASSURANCE F
[Highrise] Note about IDENTIFICATION FORM
AML Compliance Training - Virtual Currency - 2015 052215 .pdf
AML Compliance Training - Virtual Currency - 2015.docx.pptx
AML, Keviris, Initial AML Program Proposal 052515.docx
FINCEN Notes & Links.docx
IRS-DOCS-00040306
IRS-DOCS-00040307
                                          IRS-DOCS-00040306
IRS-DOCS-00040324
IRS-DOCS-00040325 IRS-DOCS-00040342
IRS-DOCS-00040343
IRS-DOCS-00040345
                                          IRS-DOCS-00040344
IRS-DOCS-00040346
IRS-DOCS-00040347 IRS-DOCS-00040347
                                                                                       NAC AML training
KR CPA signed NAC Non-Disclosure Agrmt 082814 .pdf
IRS-DOCS-00040348 IRS-DOCS-00040351 IRS-DOCS-00040352 IRS-DOCS-00040356
                                                                                       NAC-Coin Exch Agrmnt ANX Signed Term Sheet..pdf
IRS-DOCS-00040357 IRS-DOCS-00040362 IRS-DOCS-00040363 IRS-DOCS-00040363
                                                                                       Signed Bkkp Eng Itr W-OfficeSquad.pdf
Signed Term Sheet.
NAC-ANX Signed Term Sheet..pdf
IRS-DOCS-00040364 IRS-DOCS-00040368
IRS-DOCS-00040369 IRS-DOCS-00040369 IRS-DOCS-00040370 IRS-DOCS-00040375
                                                                                        Contracts
                                                                                       Agreements.pdf
                                                                                      Forward: NAC, giving Barbara Kresek access to NAC's business bank account 
Fw: Attached are your LLC papers 
NAC Foundation, LLC papers.pdf
IRS-DOCS-00040376 IRS-DOCS-00040377
IRS-DOCS-00040378
IRS-DOCS-00040379
                                          IRS-DOCS-00040378
IRS-DOCS-00040386
                                                                                      KR CPA. LLC bookkeeping services in Las Vegas.
Aten Black Gold Coin Bkkpng agreement 080714.pdf
FS Mnthly Cover sht without KR CPA name .docx
IRS-DOCS-00040387 IRS-DOCS-00040387
IRS-DOCS-00040388
IRS-DOCS-00040391
                                          IRS-DOCS-00040390
IRS-DOCS-00040391
IRS-DOCS-00040392 IRS-DOCS-00040392
                                                                                       auto-1416430947-7025154012-13612440156.way
                                           IRS-DOCS-00040397
                                                                                       NAC draft of sales P&P activities emailed to Marcus 12-11-14 .docx
IRS-DOCS-00040393
IRS-DOCS-00040398
                                           IRS-DOCS-00040402
IRS-DOCS-00040403 IRS-DOCS-00040405 IRS-DOCS-00040406 IRS-DOCS-00040409
                                                                                       NAC orig procedure draft from Osquard.docx
NAC P&P transcript frm phn call W-Marcus .docx
| RS-DOCS-00040410 | RS-DOCS-00040410 | RE: Phone recording, 11/19 at 1pm | RS-DOCS-00040411 | RS-DOCS-00040411 | RS-DOCS-00040411 | RS-DOCS-00040412 | RS-DOCS-00040412 | RS-DOCS-00040412 | RS-DOCS-00040412 | RS-DOCS-00040414 | RS-DOCS-00040
IRS-DOCS-00040415 IRS-DOCS-00040415 IRS-DOCS-00040416 IRS-DOCS-00040416
                                                                                      NAC Itr for Marcus loan application from KR CPA, LLC 060415.docx
NAC Itr for Marcus loan application from KR CPA, LLC 060415.pdf
IRS-DOCS-00040417 IRS-DOCS-00040417 IRS-DOCS-00040418 IRS-DOCS-00040418
                                                                                      Fw: Great News!
image002.jpg
IRS-DOCS-00040419 IRS-DOCS-00040419 aten coin1.ipg
| IRS-DOCS-00040420 | IRS-DOCS-00040420 | Fw: Meeting | IRS-DOCS-00040421 | IRS-DOCS-00040421 | Image001.jp | IRS-DOCS-00040422 | IRS-DOCS-00040423 | Re: Update
                                                                                       Fw: Meeting on Nov. 10th, 2014
                                                                                       image001.ipg
IRS-DOCS-00040424 IRS-DOCS-00040424 IRS-DOCS-00040425 IRS-DOCS-00040427
                                                                                       SEC Opinion Letter
Ken Lo Opinion v2 11-11-14.pdf
                                                                                      NAC Main TO DO List.docx
Updating NAC's CPA website
NV NAC Foundation, LLC papers.pdf
IRS-DOCS-00040428 IRS-DOCS-00040428
IRS-DOCS-00040429 IRS-DOCS-00040429 IRS-DOCS-00040430 IRS-DOCS-00040437
                                                                                       Accounting for Virtual Currency article copied 092514.docx IRS Notice 2014-21 regarding virtural currency copied 092514.docx
IRS-DOCS-00040438 IRS-DOCS-00040445
IRS-DOCS-00040446
                                            IRS-DOCS-00040452
                                                                                       IRS Notice 2014-21 regarding virtural currency copied 092514.pdf
Fw: This is a must read on IRS Tax Guide for Virtual Currecies
Virtual Currency notes 092514.docx
IRS-DOCS-00040453 IRS-DOCS-00040458
IRS-DOCS-00040459 IRS-DOCS-00040459 IRS-DOCS-00040460 IRS-DOCS-00040472 IRS-DOCS-00040473 IRS-DOCS-00040475
                                                                                      Virtual Currency Q&A posted on CPA website, 092914.docx
Virtual Currency tax Q&A to posted on website-1, 092914.docx
What Bitcoin Means for Tax Compliance.
IRS-DOCS-00040476
IRS-DOCS-00040480
                                          IRS-DOCS-00040479
IRS-DOCS-00040482
                                                                                       Become signer on acct.pdf
Wells Fargo Wire Checklist.pdf
IRS-DOCS-00040483 IRS-DOCS-00040486
IRS-DOCS-00040487 IRS-DOCS-00040489 Wells Fargo Wire Checklist,pdf
IRS-DOCS-00040490 IRS-DOCS-00040490 aten clients Update 10-22-14 from Marcus .xlsx
                                                                                       aten coins 2014 YE sale wk sht PBC 022615.xlsx
Client missing items from Nov 2014 email frm OffSqud .xlsx
NAC 2014 ITR Wk Sheet 032115.xlsx
IRS-DOCS-00040491 IRS-DOCS-00040491 IRS-DOCS-00040492 IRS-DOCS-00040492
IRS-DOCS-00040493 IRS-DOCS-00040493
IRS-DOCS-00040494 IRS-DOCS-00040500 IRS-DOCS-00040501 IRS-DOCS-00040501
                                                                                      NAC's 2014 Aten Coin Summary Report.pdf
Office Squad prepared Project for Coin totals 2014 rec'd 010418.xlsx
IRS-DOCS-00040502 IRS-DOCS-00040502
                                                                                       June Client List Updated 06.09.15.xlsx
IRS-DOCS-00040503 IRS-DOCS-00040507
                                                                                       NAC's 2015 Aten Coin Summary Report.pdf
Office Squad prepared Project for Coin totals 2015 rec'd 010418.xlsx
IRS-DOCS-00040508
                                           IRS-DOCS-00040508
                                                                                      Update on 2014 & 2015 old Aten Coin holders
NAC's 2014 Aten Coin Summary Report.pdf
NAC's 2015 Aten Coin Summary Report.pdf
IRS-DOCS-00040509 IRS-DOCS-00040510
IRS-DOCS-00040517
IRS-DOCS-00040517
IRS-DOCS-00040518
IRS-DOCS-00040522
IRS-DOCS-00040523 IRS-DOCS-00040523
                                                                                       NAC 2014 and 2015 Coin Totals
                                            IRS-DOCS-00040524
                                                                                        Project for Coin totals 2014.xlsx
IRS-DOCS-00040524
IRS-DOCS-00040525
                                           IRS-DOCS-00040525
                                                                                       Project for Coin totals 2015 xlsx
IRS-DOCS-00040526 IRS-DOCS-00040526 Off Squd Project for Coin totals IRS-DOCS-00040527 Project for Coin totals 2015.xlsx
                                                                                       Off Squd Project for Coin totals 2014 010418.xlsx
                                                                                       aten clients list Update 10-22-14 to upload to HR CRM 10214 .xlsx
 IRS-DOCS-00040528 IRS-DOCS-00040528
 IRS-DOCS-00040529 IRS-DOCS-00040530 Re: Client List
```

Case 3:20-cr-00249-RS Document 523-1 Filed 02/02/25 Page 19 of 21

EXHIBIT B



Internal Revenue Service Criminal Investigation

Memorandum of Interview

Investigation #: 1000302207 Location: KRCPA, LLC – Conference Room

Investigation Name: Rowland M. Andrade 7495 West Azure Drive **Date:** February 20, 2020 Las Vegas, NV 89130

Time: Approximately 3:40 p.m. to 4:15 p.m. Participant(s): Karl Ruzicka, Certified Public Accountant

Kendl Tovey, Special Agent IRS-CI Bryan Wong, Special Agent IRS-CI

On the above date and time, Bryan Wong (Agent Wong) and Kendl Tovey (Agent Tovey) met with Karl Ruzicka (Ruzicka) to discuss his business relationship with the NAC Foundation, LLC (NAC), NAC Payroll Services, Inc. (NAC Payroll) and Rowland Marcus Andrade (Andrade). Agent Wong recorded the conversation saved as "Recording Ruzicka Karl 2020-02-20.mp3" (hereinafter "Electronic Recording"). Please refer to the Electronic Recording of the interview for specific details of the conversation. Below is a brief summary of the statements made by Ruzicka:

- Andrade hired Ruzicka to work on the books and taxes for NAC. Although Ruzicka prepared trial balances and other statements, he did not prepare the tax returns for NAC or NAC Payroll. Ruzicka provided the accounting statements to Raul LNU, Andrade's CPA in Texas.
- 2. Ruzicka initially performed accounting services for the NAC but later outsourced the work to Office Squad, a bookkeeping service located inside his building. Although Office Squad complied the reports, Ruzicka reviewed and approved the statements prior to sending it to Andrade's CPA in Texas.
- 3. Ruzicka believes the money deposited into the NAC Payroll account are from ICO investors. Ruzicka wrote checks and wired money from the NAC Payroll account. Generally, Andrade emailed Ruzicka with a request to pay a vendor. Once the vendors emailed Ruzicka with the invoice, he either wired or wrote a check for payment.

I prepared this summary memorandum from my memory and after reviewing the electronic recording of Karl Ruzicka, CPA.

Bryan Wong

Special Agent, IRS-CI

Kendl Joney

Kendl Tovey Special Agent, IRS-CI